

70506-249

03/18/2013

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

MAR 18 2013

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Gary R. Orr Ph.D.
Regulatory Affairs Manager
United Phosphorus, Inc.
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406

Subject **Symmetry NXG**
EPA Registration No. 70506-249
Application Date: February 15, 2013
Receipt Date: February 22, 2013

Dear Dr. Orr:

This acknowledges receipt of your Notification submitted under the provision of PR Notice 98-10, and FIFRA section 3(c) 9.

Proposed Notification:

Registrant is adding large container handling language per PR Notice 2007-4 and a modified Warranty statement to their product label

General Comment:

Based upon a review of the material submitted, the label dated 2/23/13 is **acceptable**. A copy of the label will be placed in the record for the product.

Should you have any questions or comments concerning this letter, you may contact me by telephone at (703) 308-6416 or by e-mail at Campbell-Mcfarlane.Jacqueline@epa.gov or Glen McLeod by telephone at (703) 347-0181 or by e-mail at mcleod.glen@epa.gov. When submitting information or data in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely,

A handwritten signature in black ink, appearing to read "Jacqueline Campbell-McFarlane".

Jacqueline Campbell-McFarlane
Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510P)

Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 05-31-98

 EPA	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other: Notification	OPP Identifier Number
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Application for Pesticide - Section I

1. Company/Product Number 70506-249	2. EPA Product Manager Jacqueline Campbell-McFarlane	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Symmetry NXG	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated :
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

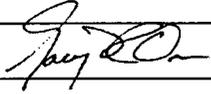
Notification of addition of large container handling language consistent with PR Notice 2007-4; modification of the warranty statement in keeping with current Agency policy.

This notification is consistent with the provisions of PR Notice 98-10 and the EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling. I understand that it is a violation of 18 U.S. C. Sec. 1001 to willfully make any false statements to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" No. per container Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" No. per container Package wgt. container		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)	
* Certification must be submitted		3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 40 LB BAG	
6. Manner in Which Label is Affixed to Product		5. Location of Label Directions			
<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Gary R. Orr, PhD	Title Regulatory Affairs Manager	Telephone No. (Include Area Code) : 919-678-4879
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Affairs Manager	
4. Typed Name Gary R. Orr, PhD	5. Date February 15, 2013	



United Phosphorus, Inc.
Gary R. Orr, PhD
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406
Phone: (919) 802-8809
email: gary.orr@uniphos.com

Via UPS

Jacqueline Campbell-McFarlane (PM 34)
Document Processing Desk (NOTIF)
Office of Pesticide Programs (H7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

February 15, 2013

**Re: Symmetry NXG (EPA Reg. No. 70506-249)
Notification – Addition of Large Container Handling Language**

Dear Ms. Campbell-McFarlane:

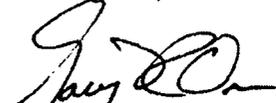
United Phosphorus, Inc. (UPI) is hereby submitting revised label language for Symmetry NXG as a Notification. The label is modified only by insertion of large container handling language keeping with that promulgated in PR Notice 2007-4, and by modifying the Warranty Statement to be consistent with current Agency policy.

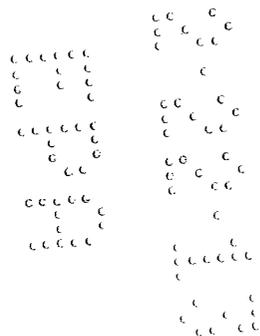
This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 USC Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Enclosed as required are EPA form 8570-1 for Notifications, and two copies of the revised label, one clearly marked so as to indicate the changes.

Please contact me if you have any questions.

Best regards,


Gary R. Orr, PhD



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REDLINE VERSION

FEB 23 2013

NOTIFICATION
Date Reviewed: 3/18/2013
Reviewed By: P. M. [Signature]

SYMMETRY NXG ALGAECIDE

For use in Fresh Water Lakes, Potable Water Reservoirs, Ponds (including Golf Course Ponds), Fish Hatcheries, Irrigation Ditches, and Other Such Slow Moving or Quiescent Bodies of Water

Water treated with Symmetry NXG can be used immediately for recreational activities, for drinking, for watering livestock, and for irrigation of crops, golf courses, ornamental plantings, and turf areas.

ACTIVE INGREDIENT

Copper Triethanolamine Complex (CAS No. 82027-59-6)*26.49%

OTHER INGREDIENTS.....73.51%

TOTAL100.00%

*Metallic copper equivalent, 8%

KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
IF INHALED	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
IF IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For medical emergencies involving this product, contact the Rocky Mountain Poison Control Center at 1-866-673-6671</p>	

FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call CHEMTREC 1-800-424-9300

United Phosphorus, Inc.
630 Freedom Business Center
King of Prussia, PA 19406 • 1-800-438-6071

EPA Reg. No. 76506-249

EPA Est. No.: _____

Net Contents: _____

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

Harmful if swallowed or absorbed through the skin. Avoid breathing vapor or spray mist. Avoid contact with skin, eyes or clothing. Prolonged or frequently repeated skin contact can cause allergic reaction in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco or using toilet. Remove and wash contaminated clothing before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Mixers, loaders, applicators, and other handlers must wear the following:

- Long-sleeve shirt,
- Long pants,
- Chemical-resistant gloves made of any waterproof material,
- Shoes plus socks.

USER SAFETY REQUIREMENTS

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

Discard clothing and other absorbent material that have been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

For applications in waters destined for use as drinking water, those waters must receive additional and separate potable water treatment. Do not apply more than 1.0 ppm as metallic copper in these waters.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic invertebrates. Waters treated with this product may be hazardous to aquatic organisms. Treatment of aquatic weeds and algae can result in oxygen loss from decomposition of dead algae and weeds. This oxygen loss can cause fish and invertebrate suffocation. To minimize this hazard, do not treat more than 1/2 of the water body to avoid depletion of oxygen due to decaying vegetation. Wait at least 14 days between treatments. Begin treatment along the shore and proceed outwards in bands to allow fish to move into untreated areas. Consult with the State or local agency with primary responsibility for regulating pesticides before applying to public waters, to determine if a permit is required.

Certain water conditions including low pH (≤ 6.5), low dissolved organic carbon (DOC) levels (3.0 ng/L or lower), and "soft" waters (i.e., alkalinity less than 50 mg/L), increases the potential acute toxicity to non-target aquatic organisms.

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal

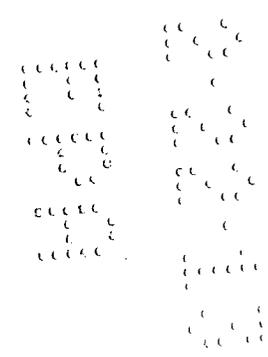
PESTICIDE STORAGE: Store in a cool, dry place.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility

CONTAINER HANDLING:

Nonrefillable container (five gallons or less). Do not reuse or refill this container to hold materials other than pesticides or dilute pesticides (rinsate). Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds after the flow begins to drip. Repeat this procedure two more times. After emptying and cleaning, it may be allowable to temporarily hold rinsate or other pesticide-related materials in the container. Contact your state regulatory agency to determine allowable practices in your state. Offer for recycling if available or puncture and discard in sanitary landfill.

Non-refillable container (greater than five gallons): Do not reuse or refill this container. Clean container promptly after emptying. **Triple rinse [or pressure rinse] as follows:** **Triple rinse:** Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container back on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling or reconditioning if available, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. Do not cut or weld metal containers. **Pressure rinse:** Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after flow begins to drip. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.



DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers are allowed in the area during application. For any requirements specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation.

Symmetry NXG is for the application to fresh water lakes, potable water reservoirs, ponds (including golf course ponds), fish hatcheries, irrigation canals, laterals, and ditches and other such slow moving or quiescent bodies of water. Symmetry NXG successfully controls diverse algal types including branched, filamentous, and planktonic species. To obtain optimal control, apply Symmetry NXG in accordance with label directions at the first appearance of algae bloom. Water treated with Symmetry NXG must be used immediately to irrigate crops, golf courses, ornamental plants, and turf areas.

Surface applications of Symmetry NXG must be made using a land-based sprayer, or spray boat. Weighted trailing hoses are required for subsurface applications. Where appropriate, Symmetry NXG must be applied as an invert emulsion, or as an admixture with a suitable polymer, (see specific instructions, and select only adjuvants approved for application in food crop production).

Decomposition of dead plant material will result in dissolved oxygen depletion and subsequent fish kill. High water temperatures and dense weed infestation are exacerbating factors. To avoid excessive oxygen depletion and fish kill, treat no more than 1/2 of the water body at one time. Do not apply more Symmetry NXG than required for the treatment area, and allow at least 14 days before making application to the remaining portion of the water body. Avoid trapping fish between the shoreline and treatment areas by treating from the shore outward toward deeper, untreated water.

Algae in the water column or on the weed surfaces can reduce the effectiveness of aquatic herbicides against *Hydrilla verticillata* and other vascular weeds. Unless specifically prohibited by the mix partner label, Symmetry NXG can be tank mixed with products containing the active ingredients, copper, fluridone, diquat and endothal, to improve aquatic weed control. If a product is tank mixed with Symmetry NXG, the more stringent requirements of the Symmetry NXG and mix partner labels must be met.

NOTE: Symmetry NXG and solutions of Symmetry NXG with cupric ion concentrations in excess of 1.0 ppm can cause non target plant injury. Do not allow sprays to drift over crops, ornamentals, grass or other desirable plants. Observe all label restrictions.

SPRAY DRIFT MANAGEMENT

A variety of factors including weather conditions (e.g., wind direction, wind speed, temperature, relative humidity) and method of application (e.g., ground, aerial, airblast, chemigation) can influence pesticide drift. The applicator must evaluate all factors and make appropriate adjustments when applying this product.

Droplet Size

Apply only as a medium or coarser spray (ASAE standard 572) or a volume mean diameter of 300 microns or greater for spinning atomizer nozzles.

Wind Speed

Do not apply at wind speeds greater than 15 mph. Only apply this product if the wind direction favors on-target deposition (approximately 3 to 10 mph), and there are no sensitive areas within 250 feet downwind.

Temperature Inversions

If applying at wind speeds less than 3 mph, the applicator must determine if a) conditions of temperature inversion exist, or b) stable atmospheric conditions exist at or below nozzle height. Do not make applications into areas of temperature inversions or stable atmospheric conditions.

Other State and Local Requirements

Applicators must follow all state and local pesticide drift requirements regarding application of copper compounds. Where states have more stringent regulations, they must be observed.

Equipment

All aerial and ground application equipment must be properly maintained and calibrated using appropriate carriers or surrogates.

Additional requirements for aerial applications:

- The boom length must not exceed 75% of the wingspan or 90% of the rotor blade diameter.
- Release spray at the lowest height consistent with efficacy and flight safety. Do not release spray at a height greater than 10 feet above the crop canopy unless a greater height is required for aircraft safety.
- When applications are made with a crosswind, the swath must be displaced downwind. The applicator must compensate for this displacement at the up and downwind edge of the application area by adjusting the path of the aircraft upwind.

Additional requirements for ground boom application:

- Do not apply with a nozzle height greater than 4 feet above the crop canopy.

ALGAE CONTROL

See Table 1 for a listing of indigenous algae, diatom, and protozoa genera controlled by Symmetry NXG. Control of free floating genera is obtained at rates equivalent to 0.2 to 0.5 ppm metallic copper. Control of mat forming genera requires rates equivalent to 0.5 to 1.0 ppm metallic copper. Hard to control genera such as *Chara* and *Phormidium* require a rate of 0.5 to 1.0 ppm metallic copper to be applied at the first signs of algal growth. The lower ends of the required ranges can be used in soft water and low growth situations. Higher rates within the required ranges must be used in situations of hard water or high algal growth. Always consult your State Fish and Game Agency or other responsible agency before applying this product to public waters.

Best results are obtained when Symmetry NXG is applied at the first appearance of algae and when water temperatures are above 60°F. Apply under calm conditions in a manner that uniformly distributes Symmetry NXG throughout the treated area.

Symmetry NXG must be applied directly, but a 10 to 20 fold dilution of Symmetry NXG with water facilitates uniform application. Large mats of floating algae must be removed prior to treatment, and a second application at least 2 weeks following the initial treatment are required in areas of dense algae growth.

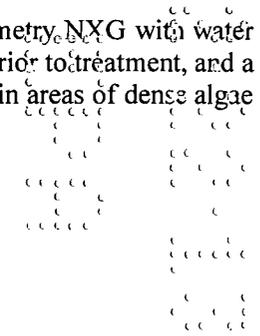


Table 1. Copper Levels Required for Control of Different Genera of Algae

ORGANISM	0.2 – 0.5 ppm COPPER		0.5 – 1.0 ppm COPPER	
	Cyanophyceae (Blue-green algae)	<i>Anabaena</i> <i>Aphanizomenon</i> <i>Cylindrospermum</i> <i>Gloeotrichia</i> <i>Gomphosphaeria</i>	<i>Microcystis</i> <i>Oscillatoria</i> <i>Plectonema</i> <i>Polycystis</i>	<i>Calothrix</i> <i>Nostoc</i>
Chlorophyceae (Green algae)	<i>Botryococcus</i> <i>Closterium</i> <i>Coelastrum</i> <i>Draparnaldia</i> <i>Enteromorpha</i> <i>Gloecystis</i>	<i>Hydrodictyon</i> <i>Microspora</i> <i>Spirogyra</i> <i>Tribonema</i> <i>Ulothrix</i> <i>Zygnema</i>	<i>Ankistrodesmus</i> <i>Chara</i> <i>Chlorella</i> <i>Cladophora</i> <i>Crucigenia</i> <i>Desmidium</i> <i>Golenkinia</i>	<i>Nitella</i> <i>Oocystis</i> <i>Palmella</i> <i>Pithophora</i> <i>Scenedesmus</i> <i>Staurastrum</i> <i>Tetraedron</i>
Diatomaceae (Diatoms)	<i>Asterionella</i> <i>Fragilaria</i> <i>Gomphonema</i> <i>Melosira</i> <i>Navicula</i>	<i>Nitzchia</i> <i>Stephanodiscus</i> <i>Synedra</i> <i>Tabellaria</i>	<i>Achnanthes</i> <i>Cymbella</i> <i>Neidium</i>	
Protozoa (Flagellates)	<i>Ceratium</i> <i>Cryptomonas</i> <i>Dinobryon</i> <i>Euglena</i> <i>Glenodinium</i>	<i>Mallomonas</i> <i>Synura</i> <i>Uroglena</i> <i>Volvox</i>	<i>Chlamydomonas</i> <i>Eudorina</i> <i>Hawmatococcus</i>	<i>Pandorina</i> <i>Peridinium</i>

Table 2 gives the amount of Symmetry NXG required to achieve a desired copper concentration in quiescent or slow moving waters as a function of water depth. This target concentration must be maintained for a minimum of 3 hours to achieve optimal algae control. In moving water, where flow will result in significant reduction of copper ion within 3 hours of treatment, application of Symmetry NXG through a metering system is required (See instructions for Drip System Application below).

Table 2. Application Rates for Quiescent or Slow Moving Water

Average Depth of Water of Treatment Site (Feet)	Gallons of Symmetry NXG per Surface Acre to Achieve the Desired Copper Concentration		
	0.2 ppm Cu	0.5 ppm Cu	1.0 ppm Cu
1	0.7	1.7	3.4
2	1.4	3.4	6.8
3	2.0	5.1	10.2
4	2.7	6.8	13.6

STRATIFIED LAKES (Summer Application) – Lakes known to be stratified require treatment of the upper 6 feet of water only.

NON-STRATIFIED LAKES (Spring/Fall Application) – Non-stratified lakes require treatments based on the total water depth. To avoid adverse effects on fish population, treat no more than 1/2 of the water body at a time.

METHODS OF APPLICATION

SURFACE APPLICATION: Surface applications are appropriate for shallow depths of 4 feet or less. Use a diluted spray mixture and apply evenly across the surface of the water from a boat or from shore.

SUBSURFACE APPLICATION: Subsurface applications of Symmetry NXG are required for water depths exceeding 4 feet. Weighted trailing hoses must be set to deliver the required rate of Symmetry NXG to zones containing dense algae populations. Subsurface application can be used for direct or invert applications of Symmetry NXG. Avoid dragging the hoses on the bottom.

POLYMER APPLICATION: Spray sinking, deposition, and retention can be improved by addition of a polymer to Symmetry NXG itself or to a dilution of Symmetry NXG in water. Follow the requirements on the polymer product label governing the use of that product in algae control.

INVERT EMULSIONS: Symmetry NXG must be applied alone or in combination with aquatic herbicides (see below) in an invert emulsion. Inverts are not suited for surface application and must be applied subsurface through submerged, weighted trailing hoses. Do not drag hoses on the bottom.

DRIP SYSTEM APPLICATION

FOR USE IN IRRIGATION CONVEYANCE SYSTEMS AND OTHER MOVING WATER

In irrigation systems, application must be made prior to appearance of algae. Delayed treatment can allow growth of algae mats that can impede the flow and delivery of water through obstruction of system components including lateral headgates, pumps, pumping systems, screens, and siphon tubes. It can be necessary to increase water flow rates during treatment to achieve good chemical distribution and effective algae control.

Application rates are calculated based on water flow rate in cubic feet per second. Prior to application of Symmetry NXG, determine the system flow rate using devices which give accurate water flow measurements (e.g., weirs, or orifices). Lacking these devices, the rate of flow can be estimated by the following formula:

$$\text{Average Width (feet)} \times \text{Average Depth (feet)} \times \text{Average Velocity (feet/second)} \times 0.9 = \text{Cubic Feet per Second (C.F.S.)}$$

Velocity can be estimated by measuring the time it takes a floating object to travel a predetermined distance down the middle of the canal. Velocity (feet/second) is then the distance traveled (feet) divided by the time (seconds) required. The average velocity is the arithmetic mean of the results obtained from a minimum of three individual velocity measurements. Use this average velocity (feet/second) in the formula above to determine the flow rate (C.F.S.).

Once the flow rate is known, the appropriate Symmetry NXG drip rate can be read from Table 3.

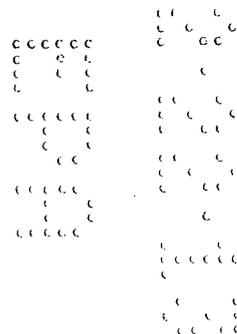


Table 3. Application Rates for Moving Water

WATER FLOW RATE		SYMMETRY NXG DRIP RATE (to give 1.0 ppm Cu)		
C.F.S.	GAL./MIN.	QTS./HR.	mL/MIN.	FL. OZ./MIN.
1	500	1.25	20	0.7
2	1000	2.50	40	1.3
3	1500	3.75	60	2.0
4	2000	5.00	80	2.3
5	2500	6.25	100	3.3

Determining Amount of Symmetry NXG: The rates shown in Table 3 will produce a concentration of 1.0 ppm Cu⁺⁺ in treated water. The target copper concentration is obtained by multiplying the rate value read from the table by the target concentration in ppm. As it is necessary to maintain the target application rate for a minimum of 3 hours (180 minutes), the minimum amount of Symmetry NXG needed to achieve effective control is calculated multiplying the adjusted Qts./Hr. rate by 3, the adjusted mL/Min. rate by 180; or adjusted Fl. Oz./Min. rate by 180. Apply Symmetry NXG in the channel at weirs or other turbulence creating structures or at several injection points across the flow to ensure thorough mixing and uniform dispersion.

Calibrating For Drip Application (Gravity Feed): Add the amount of Symmetry NXG required for 3 hours treatment (as calculated above) to a drum or tank equipped with an adjustable constant flow valve. Adjust the flow rate to the target value by dripping the Symmetry NXG into a clean graduated container while measuring the time required to reach a given volume. Several iterations can be necessary to achieve the target flow. Symmetry NXG captured during the valve calibration can be returned to the tank. **NOTE:** it can be necessary to readjust the constant flow valve if the drip rate changes during the 3 hour treatment period. If electricity is available, a small adjustable metering pump can be used as a more accurate means of introducing Symmetry NXG into the water.

The severity of algae infestation will dictate the distance that algae control will extend from the application point. Any subsequent applications must be made at points 3 hours downstream from the prior point of application. This step can be repeated as necessary until the entire infested area has been treated. Season long control can require periodic retreatment.

HYDRILLA VERTICILLATA CONTROL

Unless specifically prohibited by the mix partner label, Symmetry NXG can be tank mixed with Current, or with aquatic herbicide products containing diquat as the active ingredient. In these mixtures Symmetry NXG kills algae covering *Hydrilla* and thereby interfering with herbicide absorption. If a product is tank mixed with Symmetry NXG, the more stringent requirements of the Symmetry NXG and mix partner labels must be met. Table 4 gives example directions for tank mixes of Symmetry NXG with diquat based products. The complete effect of these treatments will take 8-12 weeks to develop. In cases of dense weed growth, a second application can be necessary after 12 weeks.

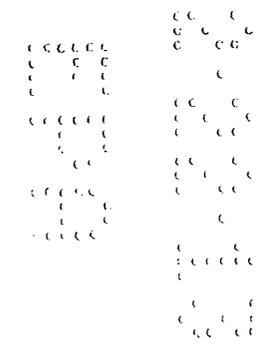


Table 4. Example Tank Mixes of Symmetry NXG Algaecide

Mix Partner	Amount of Mix Partner	Amount of Symmetry NXG	Amount of Water	Additive	Rate	Application Method
1. Diquat (35.3%) ^{1,2}	1-2 gal. ³	1.7 – 3.4 gal. ⁴	100 gal.	Invert emulsion carrier ⁵	Per A-foot	Surface Spray or subsurface injection, or bottom placement ⁶
2. Current (8% Cu)	3.34 gal.	1.7 – 3.4 gal. ⁵	10-20 gal.		Per A-foot	Surface spray or subsurface injection ⁷

¹Make applications in bright sunlight when water is above 60°F.

²In heavily infested areas, a second application after 12 weeks can be necessary.

³See the diquat product label for actual diquat application rate

⁴Use the low rate of Symmetry NXG for light infestations of easy-to-control algae species in soft water. The high rate of Symmetry NXG is indicated when any of the following conditions exist: heavy algae infestations, difficult-to-control species, or hard water.

⁵An invert emulsion carrier is indicated in slowly moving, or muddy water

⁶Bottom placement is required where *Hydrilla* growth has reached the surface

⁷Choose an application method which provides uniform coverage of the treated area and delivers the spray solution to the plant surface.

Surface Application: Apply using a hand held low pressure nozzle, or other method of application which provides uniform coverage of the treated area.

Subsurface Application: Use Delavan or Spraying System 80-degree nozzle tips fitted with 06 orifices on boom mounted trailing hoses 18 to 24 inches long. Such hoses will release the spray mixture 3 to 6 inches below the water surface. Booms can be mounted on the boat's bow or stern. Make applications in swaths no more than 20 feet apart.

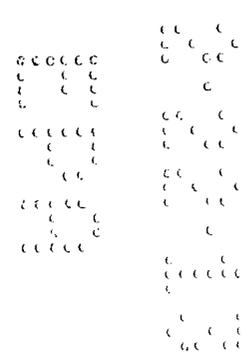
Bottom Placement: Using weighted, trailing hoses and water as the carrier, inject the diluted Symmetry NXG plus diquat mixture 1 to 2 feet above the bottom.

FISH NOTE

Symmetry NXG is toxic to fish and other aquatic invertebrates. The risk of fish toxicity generally decreases as the hardness of the water increases.

IRRIGATION WITH TREATED WATER

Water treated with Symmetry NXG in accordance with label directions shall be used for irrigation immediately after treatment.



**IMPORTANT INFORMATION
READ BEFORE USING PRODUCT**

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